

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON**

ZIRCONIA PUBLISHING, INC., a
Colorado corporation,

Plaintiff,

v.

JOHN DOE 1 A/K/A “JOANNAH
CLARKSON”, AND JOHN DOES 2-10,
individuals or unknown entities.

Defendants.

NO.: 2:15-cv-00598

**[PROPOSED] ORDER GRANTING
PLAINTIFF’S REQUEST TO CONDUCT
EARLY DISCOVERY**

Having reviewed Zirconia Publishing, Inc.’s motion for leave to seek third party discovery to learn defendants’ identities, the Court finds and orders as follows:

1. Zirconia’s motion is granted.
2. Zirconia may serve subpoenas on Amazon.com, Inc. and Google, Inc., and any internet service providers identified as a result of information provided by Amazon or Google. The subpoenas shall be directed toward information reasonably expected to reveal the John Doe defendants’ identities, including their names, addresses, telephone numbers, email addresses, IP addresses, web hosts, credit card information, bank account information, Kindle Direct Publishing information, information relating to Digital Millennium Copyright Act notices sent in

[PROPOSED] ORDER GRANTING PLAINTIFF’S
REQUEST TO CONDUCT EARLY DISCOVERY - 1

focal PLLC
800 Fifth Ave., Ste. 4100
Seattle, WA 98104
206.260.3966

1 connection with books published by Zirconia, and any other identifying information.

2 DATED this _____ day of _____ 2015.

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4 _____
5 [INSERT JUDGE]
6 United States District Court Judge
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1 Presented by:

2 **Focal PLLC**

3 /s/ Randall Moeller

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